

10/10/86

Mr. Terry McGuire Chief
Technical Support Division
California Air Resources Board
1102 "Q" Street
Post Office Box 2815
Sacramento, CA 95812

Dear Mr. McGuire,

This letter responds to your request for delegation of authority for New Source Performance Standards on behalf of the San Diego County Air Pollution Control District (SDCAPCD) dated September 16, 1986.

We have reviewed the rules submitted for delegation/redelégation purposes and found one of them to be somewhat inadequate. The enclosed review covers the following category.

Subpart JJJ - Petroleum Dry Cleaners

Until this rule is revised, we cannot delegate authority for this category. We would like to discuss our review with your staff as well as the SDCAPCD. Please have your staff contact Julie Rose of my staff at 415-974-8221 to discuss our review.

Sincerely,

Wayne A. Blackard, Chief
New Source Section
Air Operations Branch
Air Management Division

Enclosure

cc: San Diego County Air
Pollution Control District

bc Barney McIntire, SDCAPCD

CONCURRENCES							
SYMBOL	A-3-1	A31	WAB				
SURNAME	ROSE	From	BLACKARD				
DATE	10/9/86	10/9/86	10/9/86				

EPA Form 1320-1 (12-70)

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U.S. GPO : 1984-436-836

SDCAPCD NSPS Review

Regulation X, Subpart JJJ - Standards of Performance for
Petroleum Dry Cleaners

Rule 260.622 Standards for Volatile Organic Compounds

This rule is missing the requirement in 40 CFR 60.622(b) for cartridge filters to be drained in their sealed housings for eight (8) hours prior to their disposal.

The federal standard is written so that as much solvent as possible is drained from the used filter prior to disposal and that the used solvent is recycled back into the dryer. Even though the SDCAPCD rule calls for the wastes to be sealed in metal containers or underground tanks, this does not fulfill the intent of the federal standard.